

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

James Lee McClain et al

(Enter above the full name of the plaintiff
or plaintiffs in this action.)

vs.

Madison County Sheriffs
Dept.
State of Tennessee.

(Enter above the full name of the defendant
or defendants in this action.)

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DEC 10 2018

James M. Gould, Clerk
U.S. District Court
F.D. 27th, Jackson

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS UNDER 42 U.S.C., §1983

I. Previous Lawsuits

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? Yes () No (x)

B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit

Plaintiffs: _____

Defendants: _____

2. Court (if federal court, name the district; if state court, name the county): _____

3. Docket Number: _____

4. Name of judge to whom case was assigned: _____

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) _____

6. Approximate date of filing lawsuit: _____

7. Approximate date of disposition: _____

II. Place of Present Confinement: 515 S Liberty St Madison County Jail Jackson TN 38301

A. Is there a prisoner grievance procedure in the institution?

Yes ☒ No ☐

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes ☒ No ☐

C. If your answer is Yes:

1. What steps did you take? Filed a Grievance Paper grievance NOV. 2018

2. What was the result? to no avail never heard anything Denied Access to Grievances to other agencies and/or other personnel

D. If your answer is No, explain why not: _____

III. Parties

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff James McClain, Curtis McTizic, William Hayes, Wesley Chidwell, James Kerr, Larry McBride, Terrence Douglas, Natrasken Love, Pacheco Lopez
Address 515 S. Liberty, Jackson, TN, 38301

(In item B below, place the full name of the defendant in the first blank, his official position in the second blank, and his and his place of employment in the third blank. Use Item C for the names, positions, and places of employment of an additional defendants.)

B. Defendant All Madison County Sheriffs Dept employees is employed as Sheriffs and its representatives/employees
at 515 S Liberty St. Jackson, TN 38301

C. Additional Defendants: State of Tennessee and its proper representatives/employees.

IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.

The Madison County Sheriffs Dept and its employees/representatives and the State of Tennessee employees and its representatives subjected the plaintiffs herein described but not limited to All the above mentioned plaintiffs to cruel and unusual punishment their is mold and mildew on the walls, floors, and ceilings here in Madison County jail cracks in the walls in multiple cell blocks and/or pods or cells. Overpopulated by at least 6-10 inmates per cell block or pod. Some inmates are forced to sleep on the floor with or without mats and/or blankets. Not enough tables or seating to eat at tables has chipped paint along with the feed trap. Forced to live and eat under animal conditions on the floor etc see additional sheet of paper for continued statement of claim

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments.

Cite no cases or statutes.

Condemn the Madison County Jail Immediately
compel the sheriffs dept and or the state of Tennessee
to tear it down or immediately fix it. To compel
the Madison County sheriffs dept and the state of Tennessee
to stop over population, compel sheriffs dept and state
of Tennessee to kill the mold and mildew have every inmate
health checked for breathing the mold and mildew by qualified
doctors free of charge to paint tables and food trap, put mold
tables in pods or cell blocks so that inmates don't have to eat
off floor, build bunks for all inmates to sleep on. provide mats
and blankets for all inmates. Fine the sheriffs dept enormously and the state
and award the plaintiffs for pain and suffering, mental anguish, etc of the amount
totaling 50 million dollars.

VI. Jury Demand

I would like to have my case tried by a jury. Yes (☒) No (☐)

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of our information, knowledge, and belief.

Signed this 3 day of December, 2018.

James Y. C. A. E. L.

(Signature of Plaintiff/Plaintiffs)